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Attorney for Defendant
JOSE CURIEL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:22-cr-000151-WBS
)	
Plaintiff,)	STIPULATION AND ORDER TO
)	CONTINUE STATUS CONFERENCE AND
v.)	EXCLUDE TIME
)	
JOSE CURIEL, ET AL)	
)	Date: November 20, 2023
Defendants.)	Time: 9:00 a.m.
)	
)	

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel, Assistant United States Attorney Justin Lee, counsel for plaintiff, Assistant Federal Defender Megan T. Hopkins, counsel for defendant Jose Curiel, and Clemente M. Jimenez, counsel for defendant Roberto Tostado-Cadenas, that the status conference scheduled for August 28, 2023, be continued to **November 20, 2023, at 9:00 a.m.**

Defense counsel continues to review discovery and conduct investigation in this case. The parties anticipate an initial plea offer from the government prior to the next status conference, and will require additional time to review the offer with the defendants and respond to the government. The parties believe a continuance to November 20, 2023, will permit defense counsel the additional time necessary to conduct pretrial investigation, identify and interview witnesses, obtain pertinent records, and finalize any further pre-plea negotiations.

1 The parties agree that the ends of justice served by resetting the status conference date
2 outweigh the best interest of the public and the defendant in a speedy trial. Therefore the parties
3 agree that time is excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4).
4

5 Dated: August 22, 2023

Respectfully submitted,

6 HEATHER E. WILLIAMS
7 Federal Public Defender

8 /s/ Megan T. Hopkins
9 MEGAN T. HOPKINS
10 Assistant Federal Defender
11 Attorney for Defendant
12 JOSE CURIEL

13 Dated: August 22, 2023

14 /s/ Clemente M. Jimenez
15 CLEMENTE M. JIMENEZ
16 Attorney for Defendant
17 ROBERTO TOSTADO-CADENAS

18 PHILLIP A. TALBERT
19 United States Attorney


20 Dated: August 22, 2023

21 /s/ Justin Lee
22 JUSTIN LEE
23 Assistant United States Attorney
24 Attorney for Plaintiff
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ORDER

IT IS HEREBY ORDERED that the status conference scheduled for August 28, 2023, at 9:00 a.m. is continued to **November 20, 2023, at 9:00 a.m.** The time period through November 20, 2023, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

Dated: August 23, 2023


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE